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Attorneys for Plaintiff,  
IRMA RODRIGUEZ

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

IRMA RODRIGUEZ,

Plaintiff,

v.

YOUR FIRST CHOICE, LLC D/B/A  
FIRST CHOICE PAYDAY LOAN,

Defendant.

**Case No.: 2:16-cv-02447-APG-CWH**

**PLAINTIFF'S PROPOSED  
VOIR DIRE QUESTIONS**

**PLAINTIFF'S REQUEST FOR VOIR DIRE QUESTIONS**

Plaintiff IRMA RODRIGUEZ requests that, at such time as Voir Dire of the jury is

conducted, the Court ask the jury each of the attached questions number 1 through 21.

Dated this 12th day of April 2018.

Respectfully submitted,

/s/ David H. Krieger, Esq.

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Attorneys for Plaintiff,  
IRMA RODRIGUEZ

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 1**

Does anyone on this panel know:

- Irma Rodriguez
- Janie Chavez
- Art Chavez
- any employee or owner of First Choice Payday Loan company
- An owner of a pay day loan company
- An employee at a pay day loan company
- Any of the attorneys here today

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 2**

The facts in this case include Defendant First Choice Payday Loan Company's harassing and illegal attempts to collect a debt from the Plaintiff Irma Rodriguez. Does anyone on the panel have any knowledge of this case?

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 3**

Are there any members of this panel who are or have worked in the debt collection industry or have been employed by a collection agency or who have family members or close friends who are so employed?

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 4**

Are there any members of this panel who are or have been engaged in or employed by a business that refers accounts to a collection agency or who have family members or close friends who are so employed?

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 5**

Are there any members of this panel who ever had difficulty making ends meet or knew a close family member or friend who had difficulty?

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 6**

Are there any members of this panel who have ever applied for or obtained a pay day loan or knew a close family member or friend who applied?

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 7**

Are there any members of this panel who have ever had to default on a loan or knew a close family member or friend who had to default?

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 8**

Are there any members of this panel who have ever had to file for bankruptcy protection or knew a close family member or friend who had to file?

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 9**

Are there any members of this panel who ever lost their job or knew a close family member or friend who was fired?

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 10**

Are there any members of this panel who had to utilize government assistance programs?

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 11**

Are there any members of this panel who have ever felt intimidated, harassed or treated unfairly by a company or an individual?

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 12**

Are there any members of this panel who were ever treated in a manner that was not fair or professional?

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 13**

Are there any members of this panel who have ever been threatened with violence?

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 14**

Are there any members of this panel who have ever had a stranger show up unexpectedly at their home?

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 15**

Are there any members of this panel who have ever feared being thrown out of their residence?

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 16**

Are there any members of this panel who have ever felt that an individual or company tried to take their power away and make them powerless?

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 17**

Are there any single mothers here who have ever felt scared for the well-being of their children because of the actions and behavior of a stranger?

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 18**

Are there any members of this panel who have ever felt that an individual or company invaded their privacy?

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 19**

Are there any members of this panel who have ever been the victim of identity theft or a data breach or who have family members or close friends who were victims?

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 20**

Are there any members of this panel who have ever had their credit report obtained illegally or who have family members or close friends who experienced that?

**PLAINTIFF'S REQUESTED VOIR DIRE**  
**QUESTION NUMBER 21**

If you determine that the Defendant violated the Plaintiff's rights under federal or state laws would you, for any reason, be unable to award punitive damages and attorney fees and costs in addition to actual damages?